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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
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9 SERVCO INSURANCE SERVICES  
10 WASHINGTON, LLC,

11 Plaintiff,

12 v.

13 JAY SOROKA, CHRISTOPHER BRUMFIELD,  
14 and MELANIE KELLY,

Defendants.

15 NO. 2:20-CV-00313-RSL

16 **STIPULATED MOTION AND ORDER  
17 REGARDING AMENDED EXPEDITED  
18 DISCOVERY AND PRELIMINARY  
19 INJUNCTION BRIEFING SCHEDULE**

20 NOTE ON MOTION CALENDAR:  
April 20, 2020

21 Plaintiff Servco Insurance Services Washington, LLC (“Servco”) and Defendants Jay  
22 Soroka, Christopher Brumfield and Melanie Kelly (“Defendants”), having come to certain  
23 agreements between them, including due to scheduling and logistical issues caused by the current  
24 COVID-19 crisis,<sup>1</sup> jointly request that this Court enter an order as follows:

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- 26 (1) Expedited discovery and briefing related to Servco’s motion for a preliminary  
injunction shall proceed according to the amended schedule set forth below.  
(2) The temporary restraining order (Dkt. 35) shall continue in full force and effect until  
the Court rules on Servco’s motion for a preliminary injunction, if such a motion is  
filed on or before June 15, 2020. If no motion is filed on or before June 15, 2020, the  
temporary restraining order shall immediately dissolve unless further agreement is

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<sup>1</sup> The Court stated in its March 11, 2020 order that it “expects the parties to adjust to changing  
public health recommendations and to stipulate to alterations in the schedule as needed.” Dkt. 35  
at Section J.

made by the parties or the Court has, for good cause, extended the filing deadline, in which case the temporary restraining order will expire when the Court has adjudicated that motion.

#### **Amended Schedule for Expedited Discovery & Preliminary Injunction Briefing**

New Deadline	Event
May 8, 2020	<b>Deadline to produce documents in response to requests for production and subpoena to Alliant.</b>
May 28-June 9, 2020	<b>Depositions to occur.</b> Depositions are limited to three hours or less, without prejudice to completing the depositions in accordance with the Federal Rules of Civil Procedure after the preliminary injunction motion is resolved. At least seven days' notice shall be provided to the deponent. If a Rule 30(b)(6) deposition is noted, any objections are to be served within two calendar days of receipt of the deposition notice and the parties are to meet and confer within two days of receipt of the objections. The parties may conduct the depositions by a mutually-acceptable web-based interface for remote depositions (e.g., TSG Reporting's LiveLitigation software).
June 15, 2020	<b>Servco to file and serve motion for preliminary injunction,</b> and note it on the Court's calendar for consideration on Friday, July 3, 2020.
June 26, 2020	<b>Defendants to file and serve opposition to motion for preliminary injunction.</b>
July 3, 2020	<b>Servco to file and serve reply in support of motion for preliminary injunction.</b>
July 3, 2020	<b>Note Date for Consideration of Preliminary Injunction.</b> Servco shall note its motion for preliminary injunction on the Court's calendar for consideration on this date. In the event that the Court schedules oral

New Deadline	Event
	argument on the motion, the parties may appear by telephone in light of the current health crisis.

DATED this 20th day of April, 2020.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 21st day of April, 2020.

Robert S. Lasnik  
 Robert S. Lasnik  
 United States District Judge